

**SheppardMullin**

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ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/7/2025

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February 6, 2025

**MEMO ENDORSED**

The Honorable Valerie E. Caproni  
United States District Court Judge for the Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Donte Goulbourne et al*, 23-cr-00544 (S.D.N.Y.)

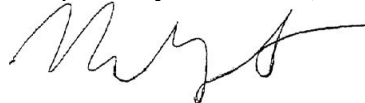
Dear Judge Caproni:

On behalf of Donte Goulbourne, a defendant in the above-captioned case, we respectfully request that Pretrial Services be granted the discretion to adjust Mr. Goulbourne's curfew without Court approval. Mr. Goulbourne will be starting a job working in the kitchen of a men's shelter in the Bronx, operated by Care for the Homeless. He is scheduled to work from 11:30 a.m. to 7:30 p.m., Thursday through Monday. His current curfew is 8 p.m. Mr. Goulbourne will be taking public transit to and from work and may not be able to arrive home before his 8 p.m. curfew. Pretrial Services does not object to this request, and the Government defers to Pretrial Services.

We also write to request an adjournment of Mr. Goulbourne's sentencing date until after March 4, 2025. The reason for this request is to allow a family friend who Goulbourne describes as his mother-in-law to attend his sentencing. She works in construction, and we understand that she was called to Tennessee to work through February. See Ex. 1. We understand that the Court requested mutual availabilities for the week of March 17, 2025, but Ms. Dang has informed us she will be at trial that week. If the Court would inform us of another week that would work, the parties will provide the Court with multiple availabilities.

Thank you for your consideration of these requests.

Respectfully Submitted,



**SheppardMullin**

The Honorable Valerie E. Caproni

November 8, 2023

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Michael J. Gilbert

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Connie Dang, Assistant U.S. Attorney  
Francesca Piperato, U.S. Pretrial Services Officer

Application GRANTED. The conditions of Mr. Goulbourne's pretrial release are modified to give Pretrial Services discretion to adjust his curfew without Court approval.

Mr. Goulbourne's sentencing is ADJOURNED from Tuesday, February 18, 2025, at 2:30 P.M. to **Thursday, March 27, 2025, at 10:30 A.M.**

SO ORDERED.



2/7/2025

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE